



GRENADA COUNTRY REPORT

June 2018 to May 2019

**Office of the Integrity Commission
&
The Financial Intelligence Unit**

**OFFICE OF THE INTEGRITY COMMISSION AND
THE FINANCIAL INTELLIGENCE UNIT
GRENADA COUNTRY REPORT JUNE 2018 TO MAY 2019
FOR
COMMONWEALTH CARIBBEAN ASSOCIATION OF INTEGRITY
COMMISSIONS AND ANTI-CORRUPTION BODIES CONFERENCE**

INTRODUCTION

During the period 2018 to 2019 the Office of the Integrity Commission (“Commission”) and the Financial Intelligence Unit (FIU) engaged in their respective areas of work.

However, this last year saw collaborative efforts undertaken by both member organisations which were critical to their roles which required them together to tackle the challenges of corruption in Grenada’s anti-corruption sector.

The Commission proceeded with its phased approach to its work, and despite prevailing budgetary constraints, was able to place emphasis on the creation and development of specific policies, procedures and protocols, which led to the enhancement of its work. We are happy to report that in recognition of its commitment to good practices established by the Commission in its work; it is earning the current title of “Best Practice” in the Caribbean by both regional and international experts.

Both the Commission and the FIU are supported by a small dedicated group of professionals who are on a learning curve as Grenada implements its fledgling anti- corruption system. We have been extremely active in the quest to establish a robust National Anti-corruption System, therefore, good practices, policies or procedures have been deemed effective to strengthen public integrity in government. The aim to improve and update our methodologies determines our best practices.

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TRAINING AND DEVELOPMENT

We have been receiving training and advice from some of the best subject matter experts that the world, region and nation have to offer.

United Nations Office on Drugs and Crime

In 2018, the first phase of training from the United Nations Organization on Drugs and Crime (UNODC) on the Development of a **National Anti-corruption Strategy** intended to implement the requirements of the UN Convention Against Corruption, was held in Grenada with the Stakeholders of our National Anti-corruption Round Table Mechanism. The second phase of that exercise will continue in July 2019, in collaboration with the UNODC. Grenada has been blessed with training opportunities from UNODC and for this we are extremely grateful.

Virtual Centre for Excellence Training Series – Senior Leadership and Management

The Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB) June 2018 Communiqué stated that “The Association agreed to: a) Accept the offer of the Government of Grenada to provide facilities for capacity building programmes of the Association, in collaboration with the Government of India and the Commonwealth Secretariat;” . Unfortunately, Grenada has utilized existing national infrastructure through the resources of the Commission until the assignment of the agreed physical structure.

The Commission launched its Virtual “Centre for Excellence Series” and held a successful Regional Senior Leadership and Management Training Programme, in collaboration with the Commonwealth Secretariat and Grenada’s Department of Public Administration. The focus of the Training was on global best practices for public sector management systems.

The Lead facilitator was Dr. Roger Koranteng, Interim Advisor and Head of Public Sector Governance, Commonwealth Secretariat who covered several issues including; Conflict of Interest Management in keeping with International Best

Practices; Addressing Weaknesses in Organisational Governance; Ethics and Moral Conduct; and Global Trends in Anti-Corruption Deterrence.

Dirk Harrison, Chairman of the CCAICACB presented on Procurement Matters and International Best Practices and Principles of Investigation, during which practical experiences were shared by Rohan Reid of the Major Organised Crime and Anti-Corruption Agency (MOCA) the delegate from Jamaica.

Among local presenters were David Holukoff, Director of Grant Thornton, who reviewed the recent **Corruption Perception Index** published by Transparency International, and Inspector Raymond Lockiby from the Financial Intelligence Unit. He dealt with the issue of **Threats and Vulnerabilities in Public Sector Management Systems**.

The regional delegates/participants were:- Guyana/Integrity Commission: Mr. Kumar Dorisami Chairman, Mrs. Rosemary Benjamin-Noble Commissioner, and Mrs. Amanda Jaisingh Secretary; Dominica/Integrity Commission Mrs. Palestrina Rolle-George Research Officer; St Lucia/Integrity Commission Ms. Jean Morille - Secretary/CEO; and Jamaica/MOCA- Rohan Reid - Deputy Superintendent.

Local participants included the Director of Public Prosecutions, the Attorney General, the Ombudsman, Department of Public Administration (DPA), the Permanent Secretaries, Chairpersons and Chief Executive Officers from Statutory Bodies, other Senior Public Officials, Civil Society Organisations and, Staff and Commissioners from the Office of the Integrity Commission.

The four day Programme was delivered in Three Sessions: Session One for General Stakeholders, March 25 and 26, 2019, had fifty (50) participants; Session Two for Statutory Bodies, March 27, 2019, had fifty four (54) participants; and Session Three for the National Anti-Corruption Roundtable Mechanism, March 28, 2019, had thirty eight (38) participants. The regional participants attended all three Sessions.

Integrity Commission Grenada facilitates Sharing with Regional Colleagues

During the half day sessions of the Senior Leadership Training the regional participants were invited to a sharing of information on the * Administrative and Operations Systems of the Integrity Commission Grenada. Two half day sessions were held at the Office of the Integrity Commission. Our structure, policies, procedures, practices and documents, were shared with our colleagues. Additionally, we focused on the Authority of the Commission, Declaration and Compliance processes, Chain of Custody procedures, Investigations and Risk Management, Complaints, Educational Outreach Seminars and Activities.

The participants were very receptive and pleased with what was shared and there were many questions during and after the sessions.

Grenada's Chairperson attends 4th Gathering of the ParlAmericas Open Parliament Network

Chairman Lady Anande Trotman-Joseph, was invited to showcase the work of Grenada's Integrity Commission at the **4th Gathering of the ParlAmericas Open Parliament Network** which was held in Quito, Ecuador from March 12 – 14, 2019. Lady Trotman-Joseph presented on “**Strengthening Parliamentary Oversight to Promote Openness and Counter Corruption**”. The presentation focused on:-

- Key aspects of a public integrity regime;
- Important provision within the law to regulate this issue;
- Good practices, policies or procedures that have been deemed effective to strengthen public integrity in government;
- Opportunities for parliamentary collaboration with civil society to support the effective implementation of relevant laws;
- Recommendations for Parliament

The Parliament Network noted with keen interest the implementation methodologies of Grenada's Anti-corruption Regime and the initiatives and best practices undertaken by the Integrity Commission.

Commonwealth Anti-corruption Benchmarks Review Meeting

Chairman Trotman-Joseph was invited along with other academia and international organisations across the Commonwealth to the Review Meeting in London, England from 15th – 16th May 2019. Chairman, was the only Caribbean academic, who was requested to facilitate a Session on “Regulation” The Session examined twenty-two (22) Benchmarks.

The Commonwealth Anti-corruption Benchmarks are designed primarily to help governments and public sector bodies measure their anti-corruption laws, procedures, and actions against international anti-corruption good practices and implement appropriate improvements.

OUTREACH SEMINARS

One of the Integrity Commission’s key mandates is reflected in the Integrity in Public Life Act (IPLA) No.24 of 2013, Section 12 (1) (h) and reads,

“The Commission shall (h) carry out programmes of public education intended to foster an understanding of the standard of integrity”.

In that regard, the programmes delivered were:-

Grenada Industrial Development Corporation

The Commission conducted an Educational Outreach Programme for the Board of Directors, Management and Senior Staff of the Grenada Investment Development Corporation (GIDC).

The Programme was geared towards raising awareness and promoting a keen understanding of the Commission’s operations, best practices and functions in keeping with its Integrity in Public Life (IPL) Act No. 24 of 2013 and the Prevention of Corruption Act No. 15 of 2007, as well as International Anti-Corruption Frameworks (OAS Inter-American Convention Against Corruption, United Nations Convention Against Corruption) to which Grenada acceded.

Specific attention was made particularly to the managing of “Conflict of Interest” and “Gratification” as highlighted in the Code of Conduct (section 40 of the IPL Act) and the Prevention of Corruption Act, respectively. An Overview and General and Technical Functions of the Commission; Organizational Integrity; Code of Conduct and Best Practices in Public Life together with a Simulation Exercise were also shared by the presenters.

Subsequently, the Corporation developed three Draft Policies (Conflict-of-Interest, Anti-Bribery and Fraud, and Code of Conduct) and invited the Commission to review same. The review was for the purpose of having the Policies finalized and subsequently implemented.

Customs and Excise Department

The Commission conducted an Educational Outreach Programme for Junior Customs Officers of the Grenada Customs & Excise Division. The objectives of the Programme were to sensitize and share information on:-

- The responsibilities of the Integrity Commission, the Integrity in Public Life Act No. 24 of 2013 and the Prevention of Corruption Act No. 15 of 2007;
- The International Anti-Corruption Framework;
- Declaration and Compliance Process;
- How to Complete a Declaration Form;
- What is Corruption and its Negative Effects;
- The Difference Between Ethics and Integrity; and
- Code of Conduct- Conflict of Interest, Gifts and Gratification.

A total of twenty seven (27) participants were present at the Programme. Each participant received Integrity Commission Information Packs which consisted of a Brochure (***contains the Code of Conduct***), declaration form (***used for “How to complete your declaration form” exercise***), List of Relevant Anti-Corruption Legislation in Grenada and an Evaluation sheet.

Later on in the year, all twenty-seven Officers filed their Declaration of Assets, Liabilities and Income.

Physical Planning Unit

The Office of the Integrity Commission conducted an Educational Outreach Programme for the Physical Planning Unit (*Ministry of Finance*) at the GCNA Building, Kirani James Boulevard, St. George. The Objectives of the programme were to sensitize and share information on:-

- The responsibilities of the Integrity Commission, the Integrity in Public Life Act No. 24 of 2013 and the Prevention of Corruption Act No. 15 of 2007;
- The International Anti-Corruption Framework;
- Persons in Public Life vs a Public Officer;
- Code of Conduct- Conflict of Interest, Gifts & Gratification;
- Corruption and its Negative Effects;
- The Difference Between Ethics and Integrity;
- Declaration and Compliance Process; and
- Risk Management

This Programme was geared towards raising awareness and promoting a keen understanding of the Commission's operations, best practices and functions in keeping with its Legislations and Conventions. Specific attention was placed on Managing "Conflict of Interest" and "Gratification" highlighted in the Code of Conduct (section 40 of the IPL Act) and the Prevention of Corruption Act, respectively.

A total of thirteen (13) participants were present at the Programme, including the Permanent Secretary. Participants were furnished with Integrity Commission's Information Packs.

LOGO AND MASCOT COMPETITIONS

The Commission launched its Logo and Mascot Competition during the celebration of International Anti-corruption Day in December 2017. The registration period ended in July of 2018 and the winners were selected in August of the same year.

In an effort to sensitise the students and teachers of secondary schools about the work of the Commission's mandate in the area of anti-corruption, the distribution of prizes to the four winners was done at the respective secondary schools.

The presentation of the Mascot and new Logo took place during the celebration of International Anti-corruption Day on December 7, 2018. The Commission's new Logo was displayed on a Banner and the Mascot which was made, interacted with everyone present and was "a hit" with the students, especially the little ones.

At present there is a naming of the Mascot competition for students of Primary Schools, the winner of that competition will be announced in July 2019.

INTEGRITY COMMISSION OFFICIAL LOGO



INTERNATIONAL ANTI-CORRUPTION DAY CELEBRATIONS

International Anti-corruption day was celebrated by the Office of the Integrity Commission on December 7th 2018, for the second time in Grenada's history, under the two year theme from 2017- "**United Against Corruption for Development, Peace and Security**". The official date for the international celebration is December 9, of each year. However, the Commission celebrates same on the closest week day.

A new chapter in the life of the Commission was launched; The Commission's Logo and Mascot which was the highlight of the Celebration. Over 150 persons attended the event and the range of students included primary school students ages seven (7) and upwards, and representatives from The Brownies Association from Beacon Learning Centre. At the secondary level representatives from the uniformed groups were in attendance: Cadet Corp and Boy Scouts Association. The winners of the Competitions and supporters from their schools also attended. This is a much looked forward to day in the calendar of activities of the Commission.

INVESTIGATIONS

The 'Integrity Commission's Questionnaire' was adopted by the Commission and implemented. To date, the Investigations Questionnaire was sent to, and responses were received from, the following entities:-

- Department of Customs
- Housing Authority of Grenada
- Ministry of Health
- Ministry of Social Development and Housing
- Marketing and National Importing Board
- Grenada Solid Waste Management Authority

Assessments of those responses to the Questionnaire were completed by the Investigations/ Compliance Officers, and reports and recommendations were

submitted to the Commission. Follow-up actions were initiated by the Commission based on the reports. The practices and procedures of these entities are under review.

Investigations Protocol

An Investigations Protocol was adopted by the Commission, August 2018, and continues to be amended from time to time in a responsive way.

Complaints Form

A Generic Complaints Form, was developed and subsequently adopted by the Commission as a standard Complaints Form.

Marketing and National Importing Board (MNIB) Investigations

Investigations into the operations of the Marketing and National Importing Board (MNIB) commenced formally on the 2nd August 2018. The investigations were in response to various media reports concerning certain issues related to the operations of MNIB. **This was the first time that the Integrity Commission had undertaken an Investigation of this magnitude.**

In keeping with Section 12 (1) (f) (g) of the Integrity in Public Life Act (IPL), No. 24 of 2013, The Commission set up an Investigations Team and an Inquiry Team and engaged with its relevant key stakeholders, to deliver on the legal mandates of the Integrity in Public Life and the Prevention of Corruption Acts.

At present the matter is before the Court, in that the former CEO of the MNIB has challenged the authority of the Commission to conduct the investigation into the MNIB. The hearing has been scheduled for 5th June 2019.

The Integrity Commission Grenada must place on record its appreciation to CCAICACB for the training and development assistance provided by its former

Chairman Mr. Eugene Otuonye QC of the Turks and Caicos and present Chairman Mr. Dirk Harrison of Jamaica.

FILING OF DECLARATIONS/GAZETTE NOTICE OF NON COMPLIANT DECLARANTS

Two hundred and seven (207) declarants have filed their declarations for the period May 2018 to May 2019 in accordance with its mandate. Among the declarants filed are ALL Junior Customs Officers and seventy-nine Corporals and Sergeants of the Royal Grenada Police Force (RGPF).

The IC has sought to deepen its compliance analysis especially following training that the staff was exposed to by UNODC on **Auditing Asset Declarations**. Seventeen (17) of the non-compliant declarants have been issued with Final Notices and one (1) non-compliant declarant is scheduled to be Gazetted and published in at least one (1) the weekly newspaper.

A demon “How to Complete your Declaration Form” has been uploaded on the IC’s Website and the IC’s You Tube Channel; this assists persons with the completion of the Declaration Form.

NEW POLICIES AND PROCEDURES

The Commission **further developed/commenced items** in the following areas:-

- Gift Registry and management of Gifts received by Public Officials;
- Legal Systems Hub;
- **Amendment of Declarations Form;**
- Creation of Activity Summary Sheet for Declarants Personal Files;
- Creation of Declarations Email;
- Creation of Declarations Demo;

- Creation of an Investigations Grid
- Creation of a Compliance Activity Process Grid
- Procedure for Handling Non-compliance ;
- Auto response acknowledgement email for extensions;
- New Format for Asset Registry; and
- Confidentiality Agreement for persons providing Consultancy Services.

ADVANCEMENT IN COMBATING FRAUDULENT AND FINANCIAL CRIMES

The Financial Intelligence Unit further developed within the last year:-

- Operations Manual;
- Strategic Analysis Standard Operating Procedures: and
- A Tactical Targeting Analysis Standard Operating Procedures

These procedures provided the requisite benchmark to guide their operations, improve efficiency and the quality of outputs.

A number of successful money Laundering prosecutions, seizures and forfeitures were realized epitomizing the effectiveness of Grenada's legislative and procedural regime.

Building Synergies

An important strategy employed by the FIU was the strengthening of synergies and capacity building with other law enforcement agencies in the jurisdiction; this assisted in the decentralizing of money laundering investigative techniques and a greater understanding and efficiency during financial crime investigations. In fostering and strengthening our partnership with the integrity commission focus was placed on the relationship between corruption and money laundering.

Legislative Mandate

As part of its legislative mandate, the FIU provided Anti-Money Laundering and Combating the Financing of Terrorism supervision to non-Bank and designated non-Financial Business and Professions (DNFBP). Our approach has been a collaborative in tandem with the Anti-Money Laundering and Combating of Financial Terrorism Commission (AML/CFT), Grenada Authority for the Regulation of financial Institutions (GARFIN) and the Integrity Commission, in an

attempt to maximize expertise and reduce on the time spent on conducting inspections/investigations.

The recent amendment of the Proceeds of Crime Act instructs reporting entities to register with the Commission for AML/CFT purposes. The data captured will assist to advise on the level of existing risk and will ensure the required resources be allocated to minimize vulnerability gaps.

National Risk Assessment

The FIU leads the country's National Risk Assessment process, utilizing the World Bank's tool mechanism in an effort to identify, assess, and understand the money laundering and terrorist financing risks of the country. This provides the necessary action to remedy current and impending threats and vulnerabilities.

A multi-sectorial working group encompassing both private and public sector representatives was created to manage the risk assessment process. The overwhelming response of our stakeholders contributed greatly to the success of the process thus far. In short order the results of the assessment would be analyzed and used to develop a national action plan to be used as a road map to address Money Laundering and Terrorist Financing threats and vulnerabilities. A similar approach will be taken as part of Grenada's preparation for its' Mutual Evaluation process by the CFATF, a standards training workshop will be conducted in an effort to enhance country representatives understanding of the FATF standards on AML/CFT and the implementation of effective measures. Currently work has started on the technical questioner as a precursor to the impending evaluation. Commendation must be given to the Integrity Commission who played a leading facilitation role in this process.

Central government has exhibited political will to fight cyber-criminal activity by providing additional infrastructure and the requisite legislative support to broaden the scope for practitioners and to allow for greater efficiency. The FIU is therefore optimistic that with this momentum greater success will be realized.

Regional Security Systems Training

The FIU in collaboration with The Regional Security System (RSS)- Asset Recovery Unit (ARU), Barbados held a four day training session from 9th July to 12th July 2018 at the Kirani James Athletic Stadium, St. George. RSS was created out of the need for a collective response to security threats, which were impacting on the stability of the region in the early 1970's and 1980's.

There were three facilitators from the Asset Recovery Unit namely Mr. Grenville Williams who serves as Director, ARU of the RSS; Mr. Andrew Searles and Mr. Donald Sheckles RSS's legal advisors. The topics covered were Asset Recovery, Money Laundering and Crypto Currency.

The following participants attended the training: Members of the Royal Grenada Police Force (FIU, CID), Customs and Excise Department, , Inland Revenue Department, Airport Security, Anti Money Laundering Safety Commission and the Integrity Commission.

CONCLUSION

The Commission and its Stakeholders, especially the FIU remains committed in the advancement of its National Anti-corruption regime. The outcome of the MNIB Investigation will definitely impact the work of the Commission. Both the IC and the FIU pledge to continue its collaborative approach towards the fight against corruption, in Grenada, Carriacou and Petite Martinique.

The evolution of new and emerging technology continues to challenge the FIU and other law enforcement agencies to become much more creative in their approach to investigation.

We take this opportunity to express our sincere thanks to the Executive and Members of the CCAICACB for ALL of its support this past year and we look

forward to the continued sharing and exchanging of invaluable expertise, information and experiences as we forge ahead in the fight against corruption.

Grenada CCAICACB Report 2018

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